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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Ray William Abelia ,	)	Case No. 2:23-cv-01224-AC
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del>
vs.	)	ORDER FOR EXTENSION OF
	)	TIME
Kilolo Kijakazi, Acting	)	
Commissioner of Social Security,	)	
Defendant.	)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from November 27, 2023 to January 26, 2024, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs

1 being due on the same week. For the week of November 27, 2023 and December 4,  
2 2023, Counsel has 10 merit briefs due and a settlement proposal due. Counsel  
3 requires additional time to brief the issues thoroughly for the Court's  
4 consideration. Defendant does not oppose the requested extension. Counsel  
5 apologizes to the Defendant and Court for any inconvenience this may cause.

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7 Respectfully submitted,

8 Dated: November 21, 2023 PENA & BROMBERG, ATTORNEYS AT LAW  
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10 By: /s/ Dolly M. Trompeter  
11 DOLLY M. TROMPETER  
12 Attorneys for Plaintiff  
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14 Dated: November 21, 2023 PHILLIP A. TALBERT  
15 United States Attorney  
16 MATTHEW W. PILE  
17 Associate General Counsel  
18 Office of Program Litigation, Office 7

19 By: \*/s/ Oscar Gonzalez de Llano  
20 Oscar Gonzalez de Llano  
21 Special Assistant United States Attorney  
22 Attorneys for Defendant  
23 (\*As authorized by email on November 21, 2023)  
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**PROPOSED ORDER**

Pursuant to stipulation, IT IS SO ORDERED.

Dated: November 27, 2023

  
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ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE